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PRE-APPEAL BRIEF REQUEST FOR REVIEW		Docket Number (Optional) 50277-2209	
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	First Named Inventor Veshaal Singh		
	Art Unit 2178		Examiner Manglesh M. Patel
Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request. This request is being filed with a notice of appeal. The review is requested for the reason(s) stated on the attached sheet(s). Note: No more than five (5) pages may be provided. I am the <input type="checkbox"/> applicant/inventor. <input type="checkbox"/> assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96) <input checked="" type="checkbox"/> attorney or agent of record. Registration number <u>56,181</u> <input type="checkbox"/> attorney or agent acting under 37 CFR 1.34. Registration number if acting under 37 CFR 1.34 _____			
		/StoychoDDraganoff#56181/ Signature Stoycho D. Draganoff Typed or printed name (408) 414-1080 ext. 208 Telephone number March 29, 2010 Date	
NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.			

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

Confirmation No.: 8474

Veshaal SINGH

Group Art Unit No.: 2178

Serial No.: 10/656,440

Examiner: PATEL, Manglesh M.

Filed on: September 5, 2003

For: MAPPING SCHEMES FOR CREATING AND
STORING ELECTRONIC DOCUMENTS**ATTACHMENT TO PRE-APPEAL BRIEF REQUEST FOR REVIEW**

The final Office Action mailed December 28, 2009 contains clear errors and fails to show that the cited reference describes or suggests all features of Claims 1, 4-12, 33-35, and 41-55. Since a §102 rejection that does not show prior disclosure of expressly claimed features is clearly erroneous, the claims should be allowed for the reasons discussed below.

Claims 1, 4-12, 33-35, and 41-55 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Manning et al., U.S. Patent No. 6,959,416 ("MANNING"). For brevity, this attachment addresses in full only the independent claims.

1. Rejection of Independent Claims 1 and 42 under 35 U.S.C. § 102(e).

(1)

The final Office Action asserts that in col. 2, lines 3-56, MANNING describes the features of Claims 1 and 42 of: receiving commands from a user, wherein said commands establish a mapping between attributes of an XML document and attributes of a relational database; and wherein said attributes of said relational database correspond to columns in tables in said relational database. This assertion is based on a clear technical error.

MANNING describes a system for managing structured documents, such as XML documents. (See col. 2, lines 20-21 and 47-48.) Significantly, MANNING expressly describes that the tables created for storing the structured documents are generated **based on a schema** of the documents, such as a Document Type Definition (DTD). (See col. 2, lines 47-52.) In other words, the rules for creating the tables are hard-coded such that a **given** DTD will always cause the creation of the **same** set of tables. For example, with respect to its Fig. 3, in col. 5, lines 29-33 MANNING describes that an XML document manager generates a table **for each element** that is defined in a DTD corresponding to an XML document that is received for storing. Thus, a user of the MANNING system has **no** ability to **customize** the element-to-table mappings that

the system produces.

In contrast, Claims 1 and 42 expressly require receiving commands from a user, **wherein said commands establish a mapping between attributes of an XML document and attributes of a relational database**. In other words, Claims 1 and 42 feature receiving user-specified commands that establish a mapping between attributes of an XML document and attributes of a relational database. Since MANNING describes that the tables for storing an XML document are generated based on a DTD and not on user-specified commands, MANNING does not describe the above feature of Claims 1 and 42.

This technical error is also reflected in the Advisory Action mailed on March 16, 2010, which asserts that the above feature of Claims 1 and 42 is described in col. 2, lines 40-55 of MANNING. This assertion is incorrect. In col. 2, lines 40-55 and col. 7, lines 1-10, MANNING describes that a user may submit a query to search for content in XML documents that are already stored. Thus, the queries described in these passages of MANNING do not correspond to the user commands that establish a mapping between attributes of an XML document and attributes of a relational database, as featured in Claims 1 and 42.

For the above reasons, MANNING does not describe the feature of Claims 1 and 42 of receiving commands from a user, wherein said commands establish a mapping between attributes of an XML document and attributes of a relational database.

(2)

The final Office Action also reflects a clear technical error when it asserts that in col. 4, lines 25-55, MANNING describes the feature of Claims 1 and 42 of based on said commands, automatically generating a mapping scheme that represents said mapping, wherein said mapping scheme includes multiple attributes of the XML document are mapped to a single attribute of said relational database. This assertion is incorrect.

In col. 4, lines 18-67, MANNING describes some tables that are maintained in an XML repository for storing XML documents. Significantly, however, MANNING describes that for every entry in an element directory table (which includes an entry for each instance of an element in the XML documents), there is one entry in one of the element tables providing the associated objects (e.g., attribute values or content) for that instance of the element identified in the element directory table. (See col. 4, lines 35-40.) In other words, this passage of MANNING describes that each separate element of an XML document is stored in its own separate table. This is clearly illustrated in Fig. 7 of MANNING, in which a separate table (e.g., each of tables

“GraphicObject”, “Document”, “Sheet”, “Page”, “TextObject”) is used to store the instance of each separate element from the XML document (e.g., each of elements “GraphicObject”, “Document”, “Sheet”, “Page”, “TextObject”, as listed in table 214). (See col. 6, lines 41-67.)

In contrast, Claims 1 and 42 include the features of: ... generating a mapping scheme that represents said mapping, wherein said mapping scheme includes ... at least multiple attributes of the XML document mapped to a single attribute of the relational database; and wherein said attributes of said relational database correspond to columns in tables in said relational database. That is, multiple XML attributes are mapped to a single column. Since MANNING expressly describes that instances of each separate element of an XML document are stored in a separate table corresponding solely to that element, MANNING does not describe the above features of Claims 1 and 42.

The Advisory Action asserts that in col. 4, lines 25-40, MANNING suggests a one-to-many relationship. The one-to-many relationship mentioned in col. 4, line 25 of MANNING refers to a relationship between entries of two tables: Table of Element Tables (ref. 22 in Fig. 2) and the Element Directory Table (ref. 18 in Fig. 2). Significantly, **neither of these two tables has entries that correspond to columns of a table**. (An entry in the Table of Element Tables identifies a table name and an element name, and an entry in the Element Directory Table identifies an element name and identifier of an instance of an element with that element name.) Because neither table has entries that correspond to columns of a table, it is a clear technical error to say that the one-to-many relationship between the entries of these two tables suggests a mapping that maps multiple attributes of an XML document to a single column in a table in a relational database.

For the above reasons, it is respectfully submitted that MANNING does not describe the feature of Claims 1 and 42 of generating a mapping scheme in which multiple attributes of the XML document are mapped to a single attribute of said relational database.

(3)

The Office Action is clearly in error when it asserts that in col. 5, lines 10-36, MANNING describes using said mapping scheme to perform a single transformation that moves said XML document directly into said relational database: (a) without materializing said entire XML document separate from said XML document and said relational database during said transformation, and (b) without creating and storing any representation of said entire XML

document separate from said XML document and said relational database during said transformation.

With respect to its Fig. 1, in col. 3, lines 44-49 and col. 5, lines 1-4, MANNING describes a computer system that includes an XML document manager, where the XML document manager includes an XML parser known in the art that includes classes and methods for parsing, generating, manipulating, and validating XML documents. Significantly, however, with respect to its Fig. 3, in col. 5, lines 14-16 MANNING expressly describes that the logic for storing an XML document begins with the XML document manager receiving the XML document. Further, in col. 5, lines 38-45, MANNING describes that once the tables for storing the XML document are available, the XML document manager parses the received XML document to access the element instance at the first element tag in the received XML document. In other words, this passage of MANNING clearly indicates that the XML document manager in the computer system receives the entire XML document prior to starting the process of accessing the elements in the received XML document. Thus, the process of moving the elements of the received XML document into a set of database tables necessarily involves creating a representation of the entire XML document that is separate from the XML document itself and the database tables in which the XML document is eventually stored.

Since MANNING describes that a representation of the entire received XML document is created that is separate from the XML document itself and the database tables in which the XML document is stored, MANNING does not describe the above feature of Claims 1 and 42.

For example, MANNING describes that the process of accessing the elements in the XML document and storing these elements in database tables involves creating in the computer system a representation of the received XML document, which is consistent with how known XML parsers operate (as referred to in col. 5, lines 1-4 of MANNING). However, the representation of the XML document used during parsing within the computer system is separate from the XML document itself and the database tables in which the XML document is stored (as clearly illustrated in Fig. 1 of MANNING). Thus, MANNING does not describe the above feature of Claims 1 and 42.

The Advisory Action asserts that in col. 3, line 60 to col. 4, lines 1-5, MANNING describes a single transformation that moves an XML document directly into relational database tables. This assertion is incorrect. In col. 3, line 60 to col. 4, line 1, MANNING expressly describes that an XML document is scanned during the process of building the database tables

which are going to store the XML document. Since the database tables that are going to store the XML document necessarily need to exist before the XML document is actually stored, the above description of scanning the XML document clearly suggests that at least one memory representation of the entire XML document is created (for the purpose of scanning) that is separate from the XML document itself and the database tables during the process of moving the XML document into the database tables. Thus, contrary to the assertion in the Advisory Action, MANNING does not describe that the XML document is moved to database tables without creating and storing any representation of said entire XML document that is separate from said XML document and said relational database during said transformation.

For the foregoing reasons, MANNING does not describe all features of Claims 1 and 42. Thus, reversal of the rejection of Claims 1 and 42 under 35 U.S.C. § 102(e) over MANNING is respectfully requested.

2. Rejection of dependent Claims 4-12, 33-35, 41, and 43-55 under 35 U.S.C. § 102(e).

Claims 4-12, 33-35, 41, and 43-55 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by MANNING.

Each of Claims 4-12, 33-35, 41, and 43-55 depends from one of independent Claims 1 and 42, and thus includes each and every feature of the independent base claim. Thus, at least for the reasons provided above for Claims 1 and 42, the rejection of each of Claims 4-12, 33-35, 41, and 43-55 is based on clear errors. For this reason, reversal of the rejections of Claims 34-12, 33-35, 41, and 43-55 is respectfully requested.

Respectfully submitted,

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